

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

HAROLD M. ABRAHAMSEN, JR., )  
                                  )  
Plaintiff,                    )  
                                  )  
v.                             ) 2:06-CV-1039-WKW  
                                  )  
D.T. MARSHALL, *et al.*, )  
                                  )  
Defendants.                    )

**MOTION FOR EXTENSION OF TIME**  
**TO FILE SPECIAL REPORT AND ANSWER**

Come now the Defendants, Southern Health Partners, Inc. and Kenneth Nichols, M.D., and hereby move this Court for an extension of time within which to file their Special Report and Answer. As grounds for said motion, Defendants hereby set down and assign the following:

1. On January 4, 2007, this Court entered an Order for Special Report. Said Order requires that the Defendants submit a Special Report to this Court within 40 days of January 4, 2007, or by February 13, 2007.
2. Defendants have been attempting to gather the information required by the Court to complete the Special Report and Answer but have been unable to do so due to the unavailability of key personnel who provided health care services to the plaintiff.

**WHEREFORE**, Defendants request a thirty day extension within which to complete their investigation and prepare the Special Report and Answer as directed by this Court.

Respectfully submitted,

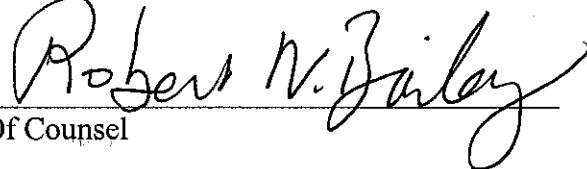
  
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Daniel F. Beasley  
Robert N. Bailey, II

LANIER FORD SHAVER & PAYNE P.C.  
200 West Side Square, Suite 5000  
P.O. Box 2087  
Huntsville, Alabama 35804  
(256) 535-1100

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 12th day of February, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and I hereby certify that I have mailed by United States Mail, postage prepaid, the document to the following non-CM/ECF participant:

Harold M. Abrahamsen, Jr.  
Inmate No. 76171  
Montgomery County Detention Facility  
P.O. Box 4599  
Montgomery, AL 36103

  
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Of Counsel